

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON (SEATTLE)**

IN RE:

MICHAEL ALAN CADDEN

SINEAD ANNE CADDEN

DEBTORS

: CHAPTER 13

: CASE NO. 18-11362

: JANUARY 29, 2021

NOTICE OF FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes Freedom Mortgage Corporation (“Creditor”), by and through undersigned counsel, and hereby submits Notice of Forbearance to the Court based on the Debtors request for mortgage payment forbearance due to hardship caused by the COVID-19 pandemic.

The Debtors contacted Creditor requesting a forbearance period of 6 months and has elected to not tender post-petition mortgage payments on property located at 10311 Sand Point Way Northeast, Seattle, WA 98125 to Creditor that would come due on the mortgage starting 12/01/2020 through 05/31/2021. Creditor has granted the Debtors forbearance request. To the extent the forbearance period is not extended for an additional period of time as provided under the CARES Act, Debtors will resume mortgage payments beginning 06/01/2021. Near the end of the forbearance period, debtor, through counsel, will need to engage with creditor on a solution for payments suspended during the forbearance.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

Respectfully submitted,

/s/ Linda St. Pierre

Linda St. Pierre, Esq.
McCalla Raymer Leibert Pierce LLC
50 Weston Street
Hartford, CT 06120
Fed Bar: 22287
Counsel for Creditor

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Forbearance Agreement due to Covid-19 Pandemic* was served upon the following parties in the following fashion on this 29th day of January, 2021:

Michael Alan Cadden
10311 Sand Point Way Northeast
Seattle, WA 98125

Sinead Anne Cadden
10311 Sand Point Way Northeast
Seattle, WA 98125

Christina L Henry (served via ECF Notification)
Henry & Degraaff, P.S.
787 Maynard Avenue South
Seattle, WA 98104

Jason Wilson-Aguilar, Trustee (served via ECF Notification)
600 University St. #1300
Seattle, WA 98101

United States Trustee (served via ECF Notification)
700 Stewart St Ste 5103
Seattle, WA 98101

/s/ Linda St. Pierre
Linda St. Pierre